

# ZMO LAW PLLC

## MEMO ENDORSED.

December 3, 2024

*Via ECF and email*

Hon. Ona T. Wang  
Southern District of New York  
US Courthouse, SDNY  
40 Foley Square  
New York, NY 10007

RE: *Jane Stone v. Annucci (SDNY)*, 20 Civ. 1326 (RA)(OTW)

Dear Judge Wang:

This office represents the Plaintiffs in the above-captioned matter. We write to request that the Court issue four subpoenas for the medical records of four of the Plaintiffs. Counsel has endeavored to get these records, but is facing significant difficulties in large part because these entities have not accepted the standard New York State courts HIPAA release form.

This has caused delays in obtaining the records, as several of the Plaintiffs have unstable housing situations and limited access to printers and other electronic devices.

As such, we are requesting the Court issue the four attached subpoenas. We are further requesting permission to submit the subpoenas under seal, as they contain the Plaintiffs' names, and the specific locations where they have received medical care.

Thank you for your attention to this case.

Very truly yours,

*Tess M. Cohen*

Tess M. Cohen  
Partner

Encls. Requested Subpoenas (4)

CC: All Counsel (via ECF)

Plaintiffs are directed to file the four referenced  
subpoenas under seal by **December 31, 2024**.

**SO ORDERED.**



Ona T. Wang  
U.S.M.J.

Dec. 20, 2024